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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAKISHA LEWIS,

Plaintiff

vs.

SUNRISE HOSPITAL AND MEDICAL CENTER,
LLC, a Delaware Limited Liability Company;
DOES I-X; and, ROE Business Entities I-X,

Defendants

Case No.: 2:21-cv-00464-CDS-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

[SECOND REQUEST]

Pursuant to LR IA 6-1 and LR 26-3, Defendant Sunrise Hospital and Medical Center, LLC (“Defendant”) and Plaintiff LaKisha Lewis (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to extend time for Plaintiff to Respond to Defendants’ Motion for Summary Judgment (ECF No. 33) from the current deadline of January 31, 2023 through and including **February 7, 2023**. This is the second request for an extension of this specific deadline. The requested extension is sought in good faith and not for purposes of undue delay. The reasons for the extension are as follows:

1. Plaintiff’s counsel continues to work with Ms. Lewis to get her input in preparing the summary judgment response and this is complicated by Ms. Lewis’s being located in

1 North Carolina (necessitating working around time zone differences and her work
2 schedule).

3 2. Plaintiff's counsel continues experiencing a very heavy workload. He filed an opening
4 brief in a Ninth Circuit case (*Raffele v. VCA, Inc.*) on January 17; another summary
5 judgment opposition in another case (*Matthys vs. Barrick Turquoise Ridge, Inc.*) on
6 January 23, 2023; and another summary judgment opposition in another case (*McIntosh*
7 *vs. City of North Las Vegas*) on January 30, 2023.

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9 3. Additionally, Plaintiff's counsel has had multiple administrative workers' compensation
10 hearings and appeals on January 17, 24, and 27, 2023.

11 4. Additionally, Plaintiff's counsel had two new clients come in with their 90 day right to
12 sue notices from Nevada Equal Rights Commission and EEOC expiring on January 30,
13 2023 that had to be filed by the deadline.

14 5. Additionally, Plaintiff's counsel came down with an upper respiratory condition (not
15 COVID-19) that he has been fighting for two weeks and is just now getting over.

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17 6. The parties further stipulate that Defendant shall have a similar extension of the deadline
18 to file its Reply to and including **March 7, 2023**.

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1 Accordingly, additional time is needed and an extension to **February 7, 2023** for the
2 Opposition is requested. Defendant will also have an extension of the deadline to file its Reply
3 until **March 7, 2023**.

4 IT IS SO STIPULATED.

6 KEMP & KEMP, ATTORNEYS AT LAW

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

8 /s/ James P. Kemp

/s/ Anthony L. Martin

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15 **ORDER**

17 **IT IS SO ORDERED.**

18 
19 UNITED STATES DISTRICT JUDGE

21 February 2, 2023
22 DATE